



June 26, 2001

US EPA RECORDS CENTER REGION 5



503930

IT Corporation

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A Member of The IT Group

I. I;
6-26-01

Ralph Dollhopf
On-Scene Coordinator
U S Environmental Protection Agency, Region V
9311 Groh Road
Room 216
Grosse Ile, Michigan 48138

**RE: South Green Avenue Site
Detroit, Michigan**

Dear Mr Dollhopf

The *Excavation/Off-Site Disposal Removal Action Work Plan* (May 24, 2001) pertaining to the above-referenced Site was previously submitted to the U S EPA. This work plan is subsequently referred to as the "Excavation Work Plan". In a June 8, 2001 letter, Altech Environmental Services, Inc (Altech) submitted a correspondence to the U.S. EPA that provided comments on the Excavation Work Plan. Altech is a subcontractor to the U S EPA's Superfund Technical Assessment and Response Team (START) contractor, Tetra Tech EM, Inc. On June 12, 2001, a meeting was held among MichCon, IT, the U S EPA, the City of Detroit, Tetra Tech and Altech to discuss the Excavation Work Plan and Altech's comments. The objective of this correspondence is to provide responses to Altech's comments. Altech's comments are presented below in *italics* and responses are presented after each comment. References to sections refer to the Excavation Work Plan.

1. Section 1.0 - Introduction

a *Last two sentences of first full paragraph on page 1-2:*

The work plan should describe the agreement reached with the owner of the Site, the City of Detroit, with regard to removal of paved areas, foundations of buildings and equipment, and underground piping and utilities. In addition, the work plan should explain how MichCon will determine which foundations will require removal "to gain access to the targeted materials". Especially with regard to the concrete foundations of the two gas holders, the work plan should discuss how MichCon will verify that the foundations have not leaked, and that targeted materials have not seeped under the foundations.

A 'right of entry' letter dated April 30, 2001 was executed by the City of Detroit and MichCon. In this letter, the City of Detroit granted MichCon "permission to enter the above-referenced Site to implement the EE/CA"

Item #4 of this right of entry letter pertains to the restoration of the Site after removal actions have been completed. As specified, "MichCon shall, immediately after completion of its activities on the Site, restore the Site to a condition that is as good as that which existed on the Site prior to MichCon's activities on the Site, . . .". This right of entry letter does not specifically refer to removal of paved areas, foundations of buildings and equipment, and underground piping and utilities.

Figure 3 of the Excavation Work Plan (enclosed) presents a map showing the former MGP structures. The current locations of some concrete surface foundations are indicated on this map as building outlines. Figure 6 shows the maximum anticipated excavation area. Based on the EE/CA, the concrete surface foundations that may potentially be removed are (see Figure 3):

- Old pipe shop
- Old purifying house
- Spray pond building
- Oil house
- Wash house
- Water gas plant

Subsurface concrete associated with underground tar tanks and tar wells and underground piping will also be removed, if impacted. The two concrete gas holder foundations are situated approximately two to three feet below the surface. During previous investigations, these concrete gas holder foundations were observed to be good condition and, as stated in the EE/CA, are not required to be removed. During excavation activities, the gas holder foundations will be uncovered. The top of the foundations will be inspected for cracks, seams and other faults. If visually impacted materials are observed around the sides of the foundations or to have migrated completely through cracks, the concrete foundations will either be removed or a boring(s) will be advanced through the concrete in order to inspect samples of the materials below the concrete foundations. If waste materials are observed beneath the foundations, the waste materials will be excavated for off-site disposal.

Additional concrete foundations outside of this area will only be removed if it is necessary to expand the excavated area. Conditions that necessitate an expansion of the excavation area are discussed below in the response to Altech's comments on Section 2.4 – Nature and Extent of Contamination.

b Last sentence of second full paragraph on page 1-2:

The beginning of this sentence should be revised as follows: "Excavation will end when the average concentrations for the excavated area, as determined using . . ."

The Excavation Work Plan was prepared based on the August 20, 2000 Engineering Evaluation/Cost Analysis (EE/CA) that was reviewed by the U.S. EPA. The last sentence of the second full paragraph on page 1-2 of the Excavation Work Plan states: "Excavation will end when the average concentrations for the Site after excavation, as determined using" The Michigan Department of Environmental Quality's (MDEQ) Part 201 Criteria Application Guidesheet for Soil Data: Generic Industrial and Commercial Direct Contact Criteria (January 1998) states the following:

"Average soil concentrations, calculated as a 95 percent UCL on the arithmetic mean, can be used to determine compliance if such values are reasonably representative of the areas where exposures are likely to occur."

Based on the current land use and the anticipated future land use (see EE/CA), 'exposures' are just as likely to occur within the anticipated excavation area as they are within the areas outside the anticipated excavation area. Therefore, it is appropriate to use average concentrations for the Site to compare to the cleanup criteria developed according to the MDEQ's Part 201 guidance.

2. Section 2.4 - Nature and Extent of Soil Contamination

The range of concentrations of the constituents of concern is identified. However, the extent of the contamination requiring remediation is not. The work plan should state whether any of the analytical results for soil samples collected outside the "Approximate

Maximum Extent of Potential Removal Action" area exceed the applicable cleanup criteria. All areas where constituents of concern were found at concentrations above the cleanup criteria should be identified.

Figure 9 (enclosed) shows the sample locations outside the "Approximate Maximum Extent of Potential Removal Action" that exceed the industrial generic cleanup criteria listed on Table 3 of the Excavation Work Plan. As indicated on this map, only three sample locations exceed these cleanup criteria: MW-8 surface sample (only benzo(a)pyrene exceeded criteria), TP-2 (three feet below the surface: only benzo(a)pyrene exceeded criteria) and SS-2 surface sample (only lead exceeded cleanup criteria).

As discussed in the EE/CA, cancer risk and noncancer hazard have been found to be within or below the U.S. EPA's target range of 10^{-6} to 10^{-4} for carcinogens and a hazard index of 1 for noncarcinogens. Based on the risk assessment results, the removal action objective discussed in the EE/CA and the Excavation Work Plan is to ensure that hazardous substances, pollutants or contaminants in subsurface bulk storage containers do not pose a threat of release to the environment. The area where such hazardous substances have been identified during the previous subsurface investigations is the area known as "Approximate Maximum Extent of Potential Removal Action".

The excavation will end when one of the following conditions are indicated:

- The excavation extends to the Site property boundaries;
- The excavation extends to the active underground gas main located along the western boundary of the Site and further excavation may impact the integrity of the gas main;
- The results of the verification sampling indicate that the average concentrations for the Site of benzene, toluene, ethylbenzene, xylenes, polynuclear aromatic hydrocarbons (PAHs) and available cyanide do not exceed cleanup criteria established according to Part 201.

3. Section 4.2.5 - Setup Temporary Facilities and Material Staging Areas

- a. *U.S. EPA is requesting unrestricted use of temporary facilities and field office space for itself and its representatives.*

U.S. EPA and its representatives will be allowed unrestricted use of temporary facilities and field office.

- b. *The Site should be mowed to expose open sumps, holes in the ground, and any other hazards before work starts at the Site. In addition, the Site should be inspected to determine whether any surface locations of environmental significance lie outside of the area to be excavated. Any such locations should be identified before contractors mobilize to the Site.*

The Site will be 'brush-hogged' before excavation activities begin.

The Site was inspected in the past by the U.S. EPA, MichCon and IT for potential surface locations of environmental significance. Three such areas were identified as containing blue-tinted surface soils. These areas are located at test pits TP-1, TP-2 and TP-3. Samples from the blue-tinted soils and surrounding soils were collected for laboratory analysis with the results presented in the EE/CA. These results indicated that the MDEQ's generic cleanup criteria were not exceeded. However, a maximum of four inches of blue-tinted soils will be removed from these three areas with the total volume of material removed not exceeding 40 cubic yards. These materials will be transported off-site for disposal as specified in the Excavation Work Plan. These areas will be backfilled as specified in the City of Detroit's right of entry letter.

- c. *For safety purposes, trees and bushes should be removed from the Site at the vehicle entrances and exits and at other locations, as necessary.*

Trees and brushes will be removed as needed at vehicle entrances, exits and possible other areas.

4. Section 4.2.9 - Identification of Utilities

- a. *A manhole identified in Figure 2 is located within the removal action area. The work plan should discuss what is connected to the manhole and what will be done with it during the removal action.*

Mr. Mike Kubien of the Detroit Water and Sewerage Department (DWSD) was contacted to determine the status of the manhole and connecting sewer. According to the DWSD, the manhole is the beginning point of either a sewer easement or a public utility easement. The City of Detroit, Planning and Development Department will be contacted (as property owner) to request permission to abandon this sewer before the excavation activities commence.

- b. *The work plan should discuss how the fire hydrant and associated water lines located within the removal action area will be addressed.*

According to Mr. Kubien (DWSD), the hydrant and water line located on the Site does not appear to be part of the DWSD water system. The City of Detroit, Planning and Development Department will be contacted (as property owner) to request permission to cut off this water line at the Site boundary and cap this line before excavation activities commence.

5. Section 4.4.1 - Excavation

- a. *The work plan should discuss how monitoring wells located within and outside the removal action area will be addressed.*

As required by the City of Detroit's right of entry letter, all monitoring wells will be properly abandoned according to ASTM standards.

- b. *The last sentence of Section 4.4.1 should be replaced with the following text:*

"The initial limits of excavation will be determined based on the absence of visually impacted materials and Site property boundaries. The final limits of excavation will be based on verification soil sampling results and Site property boundaries."

Agreed.

- c. *The work plan should explain what MichCon will do if contamination extends beyond the Site property boundaries.*

If visually-impacted materials extend beyond the Site property boundaries and if requested by the U.S. EPA, a work plan will be prepared to assess the off-site property

6. Section 4.6.1 - Sampling Procedures

The floor of the excavation is expected to be made up of clay. If there are sand seams or fractures in the clay, verification sampling locations should be biased to collect representative samples from these fractures.

Agreed.

7. Section 4.7.1 - Backfill and Compaction

- a. *MichCon will need to submit documentation to U.S. EPA verifying that the engineered fill and topsoil is acceptable before bringing it on Site.*

The backfill material will be obtained from London Aggregates in Milan, Michigan. A statement from London Aggregates that their facility is not a waste site is enclosed. A backfill sample will be collected for laboratory analysis from the initial truckload. In addition, one backfill sample per week will also be collected for analysis. The backfill samples will be analyzed for volatile organic compounds, semi-volatile organic compounds and metals.

- b. *The work plan should explain how MichCon will ensure that "clean engineered fill" placed during the removal action is not impacted by perched groundwater or by rainfall runoff from impacted materials not yet removed.*

To address this comment, one or more of the following actions will be conducted:

- At the end of each day, a small berm will be constructed around the open excavation area to prevent/minimize rainfall runoff into the excavation.
- The floor of the excavation will be sloped towards the active face and the dewatering equipment (if required). The excavation floor will be sloped away from previously backfilled areas.
- Trenches will be excavated within the sloped floor to enhance water flow away from previously backfilled areas.

8. Section 4.7.2 - Final Surface Cover

- a. The work plan should specify the thickness and specifications of the topsoil that will be placed on top of the engineered fill before hydroseeding.

Approximately four inches of topsoil containing organic materials will be placed on top of the engineered fill before hydroseeding.

- b. *The work plan should specify the "similar covering" being considered as an alternative to hydroseeding.*

"Similar cover" consists of grass seed and mulch.

- c. *The work plan should specify how long MichCon will maintain the hydroseeded area.*

Restoring the excavation areas with hydroseed complies with the City of Detroit's right of entry letter in that the Site will be restored "to a condition that is as good as that which existed on the Site prior to MichCon's activities on the Site." The hydroseeded area will be visually inspected from outside the fence once a week for six weeks after the hydroseed is spread. If grass growth is not indicated within the seeded area after six weeks, additional seeding of the area will be conducted.

9. Section 4.8.3 - Vapor and Odor Emissions

- a. *The work plan indicates that there will be "periodic monitoring of air quality around the excavations and the perimeter of the Site with a PID." The work plan should specify how often this monitoring will be done.*

Air monitoring with the PID will be conducted and recorded every 15 minutes during the first hour of each day. Afterwards, air monitoring results will be recorded once an hour. More frequent

monitoring will be conducted if the action level (10 ppm) specified in the Health and Safety Plan (November 19, 1998) is exceeded.

- b. *The work plan should state whether there will be real-time particulate monitoring at the Site.*

As specified in the Health and Safety Plan (November 19, 1998), air monitoring for dust particulate will occur when "sustained (greater than 5 minutes) levels of visible dust are generated and engineering controls such as wet methods are ineffective." A real-time particulate monitor will be at the Site during excavation activities.

- c. *The work plan indicates that ambient air monitoring samples will be collected at three locations and that they "may be revised to ensure that one station is downwind of the excavation." The work plan should specify how wind direction will be monitored and how often it will be monitored.*

Wind direction will be determined with either an air sock or a portable weather station such as a Weather Wizard III®. Wind direction will be monitored at a minimum twice per day or more frequently if obvious wind direction shifts are noted.

- d. *The work plan should state (1) when the analytical results for the daily ambient air samples will be available, (2) action levels for these analyses, and (3) specify actions that will be undertaken if levels are exceeded.*

During the first 5 days of field work, the daily ambient air sample results will be available within 24-32 hours. In addition, as discussed during the June 12, 2001 meeting, a PID will be used to record volatile organic vapors at the ambient air monitoring stations twice a day. If the PID action level specified in the Health and Safety Plan (10 ppm) is "consistently exceeded in a 5-minute period", visually unimpacted soils will be used to cover the active face of the excavation. In an attempt to prevent the consistent exceedance of the PID action level at the property boundary, the active face of the excavation will be minimized as much as possible.

10. Section 5.0 - Site Safety

The work plan should specify whether (1) the health and safety plan (HASP) covers MichCon as well as all of its subcontractors and (2) the HASP addresses site security and vandalism

The HASP covers MichCon's subcontractors. The HASP provides emergency information such as phone numbers for ambulance, fire, police and hospital. The Excavation Work Plan included an amendment to the HASP. This amendment has been modified since the hospital referred to in the HASP appears to no longer be in operation. The revised cover amendment (enclosed with revised hospital location map) provides address, phone number and location of a qualified emergency hospital.

The Site will be secured at the end of each day by locking all gates. Only necessary equipment will be left on Site overnight.

11. Section 6.0 - Project Team

The work plan should identify MichCon's on-site full-time project coordinator.

MichCon's full-time project coordinator is Darrell Grassmyer.

12. Section 7.0 - Implementation Schedule

MichCon needs to document the remediation of the Site in a final report. The work plan should state who will prepare the report and when it will be submitted

As stated in the Administrative Order by Consent (AOC) (August 4, 1998), a final report summarizing the removal actions will be submitted to the U.S. EPA within 60 calendar days after all removal actions have been completed. This report will be prepared by MichCon's consultant.

Additional Issues

Issues that were not included in Altech's June 8, 2001 letter but were discussed in the June 12, 2001 meeting are presented below.

Hand Auger Borings

Two hand auger borings will be advanced to a depth of approximately six feet below the surface. The approximate locations of these borings are shown on the enclosed Figure 9 (borings identified as HA-4 and HA-5). The objective of these borings is to determine the presence/absence of MGP waste materials at locations that do not contain soil borings and/or test pits. The subsurface materials removed from these hand auger borings will be visually inspected. If visually impacted materials are noted, soil samples of the impacted materials will be submitted to a laboratory for the analyses specified in Section 4.6.2 of the Excavation Work Plan. These analytical results will be used as part of the calculation of average Site soil concentrations.

Project Team Contact List

The names, pager numbers and phone numbers (office and cellular) of the key project team members will be provided to the U.S. EPA before excavation activities commence.

Implementation Schedule

The anticipated removal action implementation schedule referred to in Section 7.0 has been revised to include the hand auger borings and a determination by the City of Detroit regarding the request to abandon/cut off the water and sewer lines.

Truck Route

Figure 10 (enclosed) shows the anticipated access roads that will be constructed at the Site. Unless requested otherwise by the City of Detroit, the main portion of the road will be kept intact. The southeastern "Y" portion of the road will not be kept since this area is within the anticipated excavation area. The anticipated route trucks will take from the Site to the Carleton Farms landfill is described below. This route can be modified, if necessary.

- Trucks will exit primarily through South Green Avenue gates and turn right on South Green to Fort Street.
- Turn left on Fort Street to Springwells Street.
- Turn right (north) onto Springwells Street and immediately go south on Fisher Freeway (I-75).
- Take Fisher Freeway South to Sibley Street.
- Take Southfield Highway to I-94.
- Go west on Sibley to I-275.
- Go south on I-275 to Will Carleton Road exit.
- Go west on Will Carleton Road, landfill is on Will Carleton Road.

If you have any questions, or would like to discuss the responses to the U.S. EPA's comments, please contact either Darrell Grassmyer of MichCon at 313-256-6068 or myself at 734-367-1011.

Sincerely;
IT Corporation

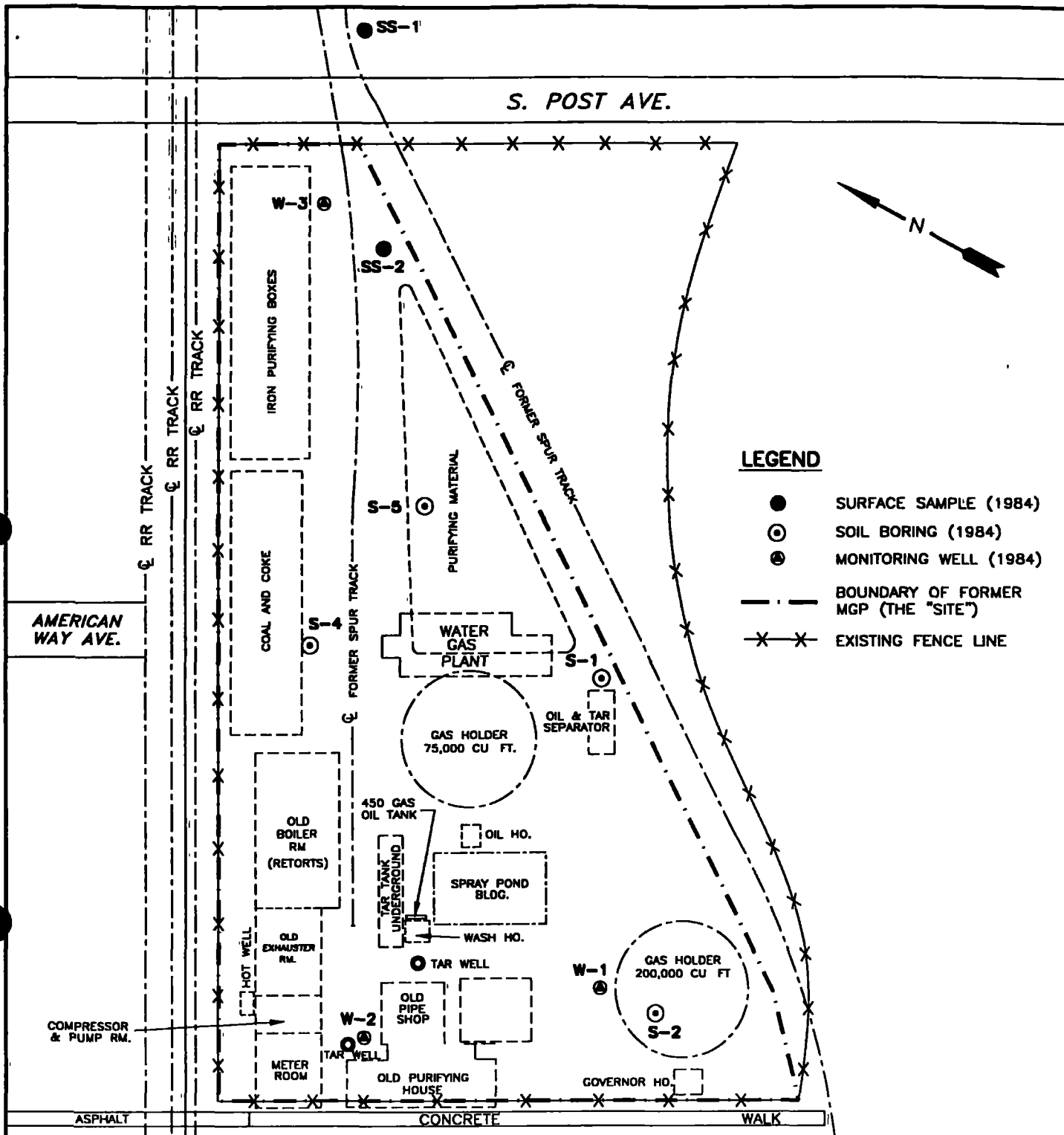
Daniel Strybel (kv)

Daniel Strybel, CPG, PMP
Project Manager

Enclosures

cc: Abed Houssari, MichCon
 Darrell Grassmyer, MichCon
 Tom Wilczak, Pepper Hamilton LLP
 Brian Barwick, U.S. EPA
 Ramesh S. Patel, City of Detroit Planning and Development Department (3 copies)
 Ed Novak, Michigan Department of Environmental Quality
 Ray Scott, City of Detroit
 David Sawicki, Tetra Tech EM Inc.

N:\CADDATA\DWG\Michcon\106115\MOFMS2.dwg Wed, 16/May/01 0:00m nmcpherson



S. GREEN AVE.



IT CORPORATION
A Member of The IT Group

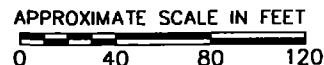
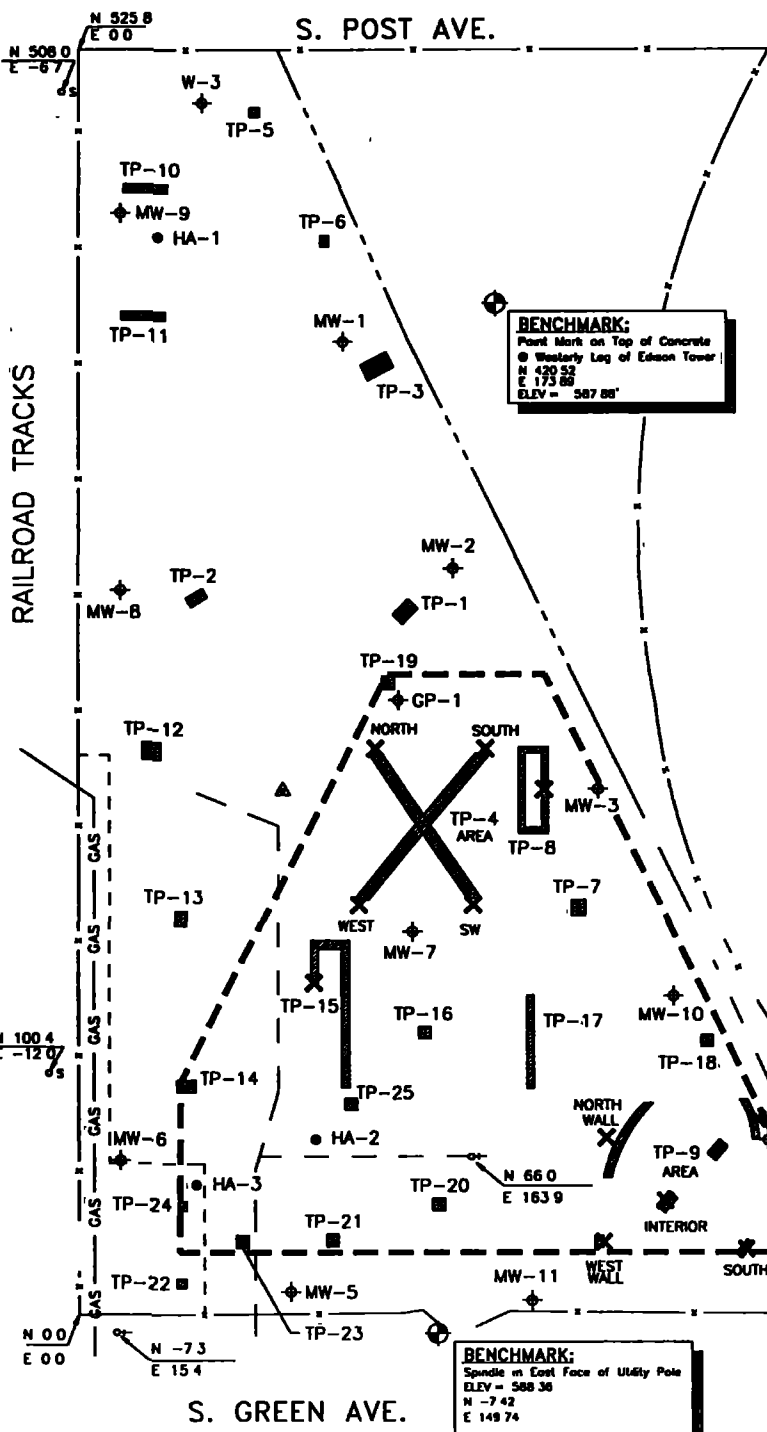
23937 RESEARCH DRIVE
FARMINGTON HILLS, MI 48335
(248) 473-0720

REV NO	DRAWING DATE	ACAD FILE
	2/1/99	MOFMS2

MAP OF FORMER MGP STRUCTURES

CLIENT	MICHIGAN CONSOLIDATED GAS COMPANY	PM
LOCATION	SOUTH GREEN AVENUE - DETROIT, MICHIGAN	PE/RG
DESIGNED	DETAILED	PROJECT NO
	TK	106115
		FIGURE
		3

THIS DRAWING AND ANY ATTACHMENTS ("DRAWINGS"), HAVE BEEN PRODUCED FOR THE SOLE USE OF THE RECIPIENT AND MUST NOT BE USED, REUSED, REPRODUCED, MODIFIED OR COPIED ("USE") IN ANY MANNER WITHOUT PRIOR WRITTEN APPROVAL OF FLUOR DANIEL GTI, INC. THIS DRAWING MAY CONTAIN CONFIDENTIAL AND PROPRIETARY INFORMATION OF FLUOR DANIEL GTI, INC. ANY UNAUTHORIZED USE OF THIS DRAWING IS STRICTLY PROHIBITED.



BASE MAP PROVIDED BY ATWELL-HICKS, INC

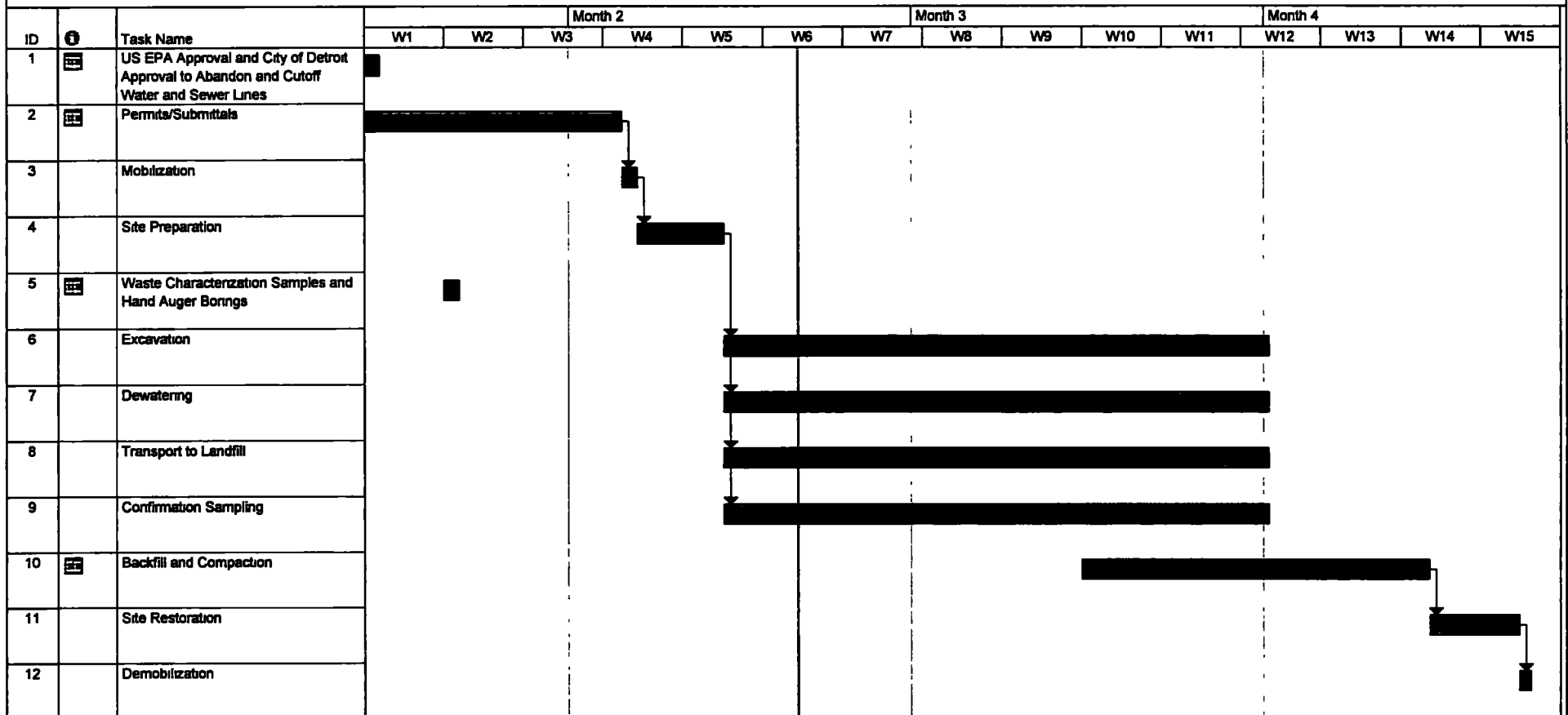


DATE 05/18/01
DWN DS
APP DS
REV DGS
PROJECT NO 106115

FIGURE 6
MICHIGAN CONSOLIDATED GAS COMPANY
SOUTH GREEN AVENUE
DETROIT, MICHIGAN
MAP SHOWING APPROXIMATE MAXIMUM
EXTENT OF POTENTIAL REMOVAL ACTION

1" 1/2" 0"
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Figure 8 (Revised)
Anticipated Project Timeline
Excavation/Off Site Disposal Removal Action
South Green Avenue Site
Detroit, Michigan



Project Removal Action
Date June 21, 2001

Task

Split

Progress

Milestone

Summary

Rolled Up Task



Rolled Up Split

Rolled Up Milestone

Rolled Up Progress

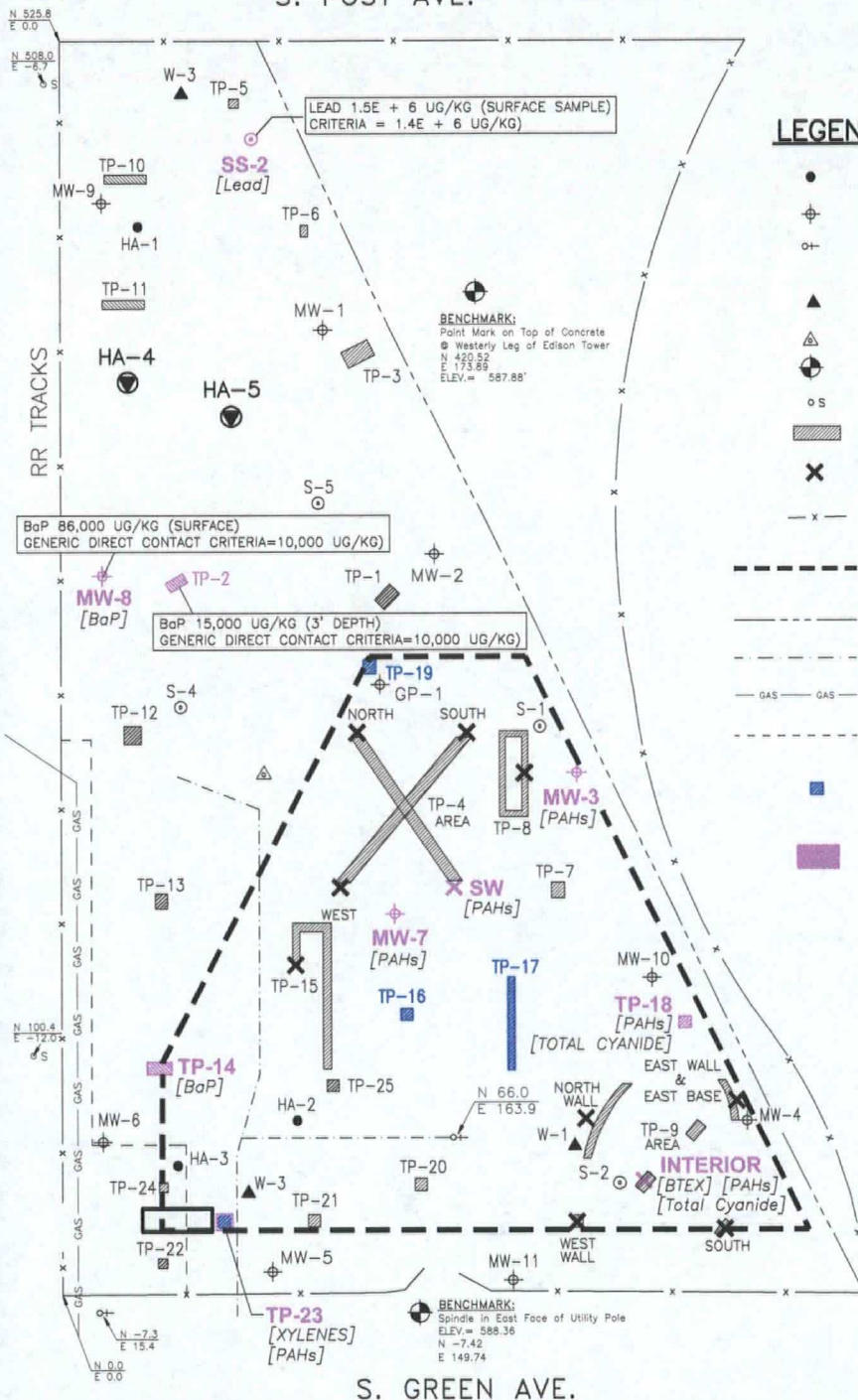


External Tasks

Project Summary



S. POST AVE.



LEGEND

- SURFACE SOIL SAMPLE LOCATION
- ⊕ MONITORING WELL
- ⊕ EXISTING HYDRANT
- ▲ APPROXIMATE LOCATIONS OF MONITORING WELLS INSTALLED IN 1984
- △ TRAVERSE POINT
- ⊙ SITE BENCHMARK
- SET IRON PIPE
- ▨ TEST PIT LOCATION
- ✕ SAMPLE LOCATION WITHIN TP-4, TP-8, TP-9 AND TP-15
- x — EXISTING FENCE
- - - - - APPROX. EXTENT OF MAXIMUM REMOVAL ACTION AREA
- - - - - APPROX. BOUNDARY OF FORMER MGP SITE
- - - - - WATER SERVICE LINE (ABANDONED)
- GAS - GAS - 16" HIGH PRESSURE NATURAL GAS
- - - - - MICHCON PROPERTY (APPROXIMATE)
- LIGHT, NON-AQUEOUS-PHASE LIQUIDS (LNAPLs) DETECTED WITHIN TEST PIT
- EXCEEDANCE OF MDEQ INDUSTRIAL GENERIC DIRECT CONTACT CLEANUP CRITERIA THAT WERE EXCEEDED
- [] = ANALYTES THAT EXCEEDED GENERIC INDUSTRIAL CRITERIA
- BaP = BENZO (a) PYRENE
- PAHs = POLYNUCLEAR AROMATIC HYDROCARBONS
- BTEX = BENZENE, TOLUENE, ETHYLBENZENE & XYLENES
- BTEX = XYLENES
- ⊙ PROPOSED HAND-AUGER BORING

APPROXIMATE SCALE IN FEET



S. GREEN AVE.



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106115

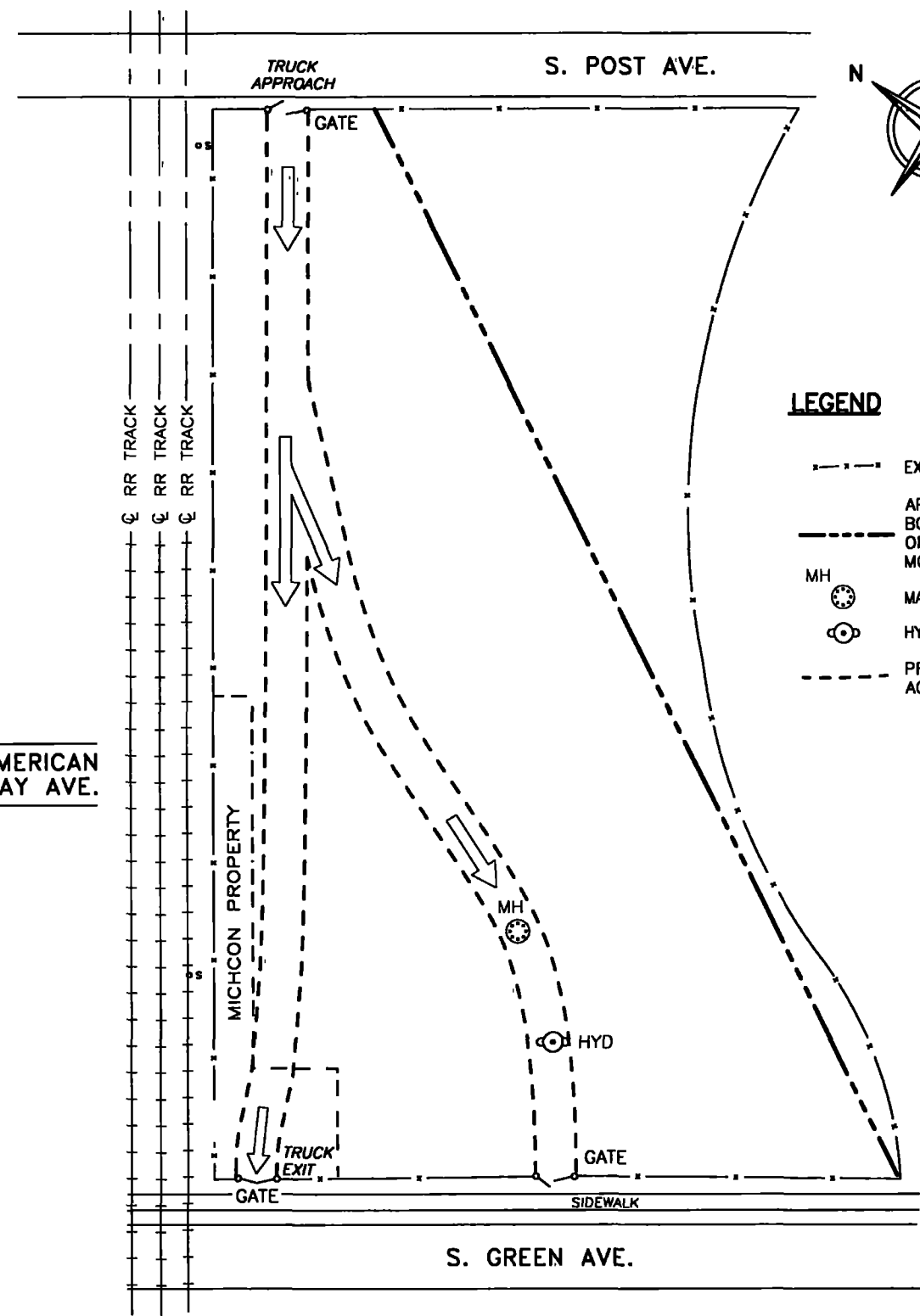
FIGURE 9
MICHIGAN CONSOLIDATED GAS COMPANY
SOUTH GREEN ST. - DETROIT, MICHIGAN
MAP SHOWING SAMPLE LOCATIONS
EXCEEDING GENERIC INDUSTRIAL
CLEANUP CRITERIA



1" 1/2" 0" 1"

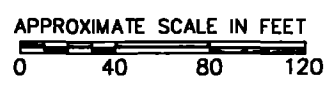
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AMERICAN WAY AVE.

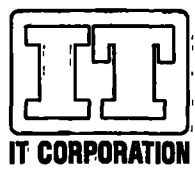


LEGEND

- EXISTING FENCE
- APPROXIMATE BOUNDARY OF FORMER MGP SITE
- MH MANHOLE
- HYD HYDRANT
- PROPOSED ACCESS ROAD



BASE MAP PROVIDED BY ATWELL-HICKS, INC.



DATE 6/21/01
 DWN DGS
 APP DS
 REV DGS
 PROJECT NO.
 106115

FIGURE 10
MICHIGAN CONSOLIDATED GAS COMPANY
SOUTH GREEN STREET
DETROIT, MICHIGAN
MAP SHOWING ACCESS ROADS
AND SOUTH GREEN AVENUE SITE

HEALTH AND SAFETY PLAN AMENDMENT SHEET

Project Name: South Green Avenue Site, Detroit, Michigan

Project Number: 106115

Project Manager: Daniel Strybel

Location: 201 South Green Avenue, Detroit, Michigan

Changes in field activities or hazards:

The *Final Health and Safety Plan* (July 15, 1996) (subsequently referred to as "Safety Plan") has been amended to include the following:

1. All references and citations to Fluor Daniel GTI are applicable to IT Corporation (IT) since IT purchased Fluor Daniel GTI in 1999.
2. The Medical/Technical Advisors listed in Section 6.1 are no longer applicable. The Medical/Technical Advisors are:

Dr. Jerry H. Becke (M.D. MPH)
1-800-350-4511
3. **Appendix D** of the Safety Plan has been replaced with IT Procedures HS020: *Accident Prevention Program: Reporting, Investigation, and Review* that is applicable to IT staff.
4. The entire **Appendix H** of the Safety Plan (Excavation/Trenching) has been replaced with IT's Excavation and Trenching Procedures. These procedures are a part of this Amendment
5. The hospital referred to in the HASP appears to no longer be in operation. Another hospital has been selected and information pertaining to this hospital is included on the attached revised SITE EMERGENCY FORM (page iv) of the HASP. A revised Hospital Location Map is also attached.

Approved by:

Health and Safety Manager _____ Date _____

SITE EMERGENCY FORM (REVISED June 21, 2001)

Contaminants of Concern: PNA's, BTEX's, Cyanide as listed in section 2.

Hazard Determination: Serious _____ Moderate X Low _____

Do not endanger your own life. Survey the situation before taking any action.

IT Corporation Office Telephone	(734) 524-9610
Site Location Address	201 South Green Avenue, Detroit, MI
Telephone Located at	to be determined

EMERGENCY PHONE NUMBERS IN THE EVENT OF ANY EMERGENCY CONTACT PROJECT MANAGER (PM) OR HEALTH AND SAFETY REPRESENTATIVE

Ambulance	911
Fire	911
Police	911
Poison Control	(800) 382-9097
Hospital Name	Detroit Receiving Hospital
Hospital Phone Number	(313) 745-3356
Project Manager	Dan Strybel (248) 473-0720
Site Safety Officer	To be determined
Health and Safety Manager	Cliff Florczak (630) 771-9200
Client Contact	Darrell Grassmyer (313) 256-6068
U.S. E.P.A. Contact	Ralph Dollhopf (734) 692-7682 Mobile Phone: (313) 917-2194

UTILITY MARKER EMERGENCY TELEPHONE NUMBERS

Utility	Color Code	Telephone Number
Water: (Detroit Water & Sewer Department)	Blue	(313) 964-9000
Gas: (Michcon)	Yellow	(313) 965-8000
Electric: (Detroit Edison)	Red	(800) 477-4747
Telephone/Cable: (Ameritech)	Orange	(810) 221-3131
Sewer: (Detroit Water & Sewer Department)	Green	(313) 964-9000
Miss Dig Telephone Number: 1-800-482-7171		

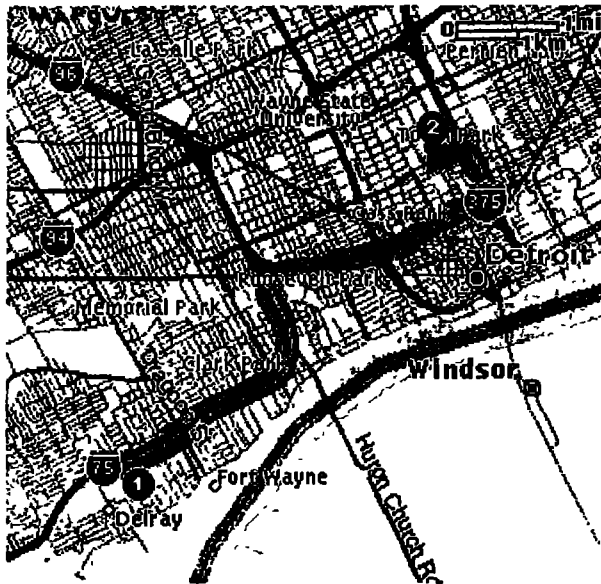
REVISED HOSPITAL LOCATION MAP

Starting from: 201 South Green St., Detroit, MI 48209-2846

Arriving at: 4201 Saint Antoine, Detroit, MI 48201-2153

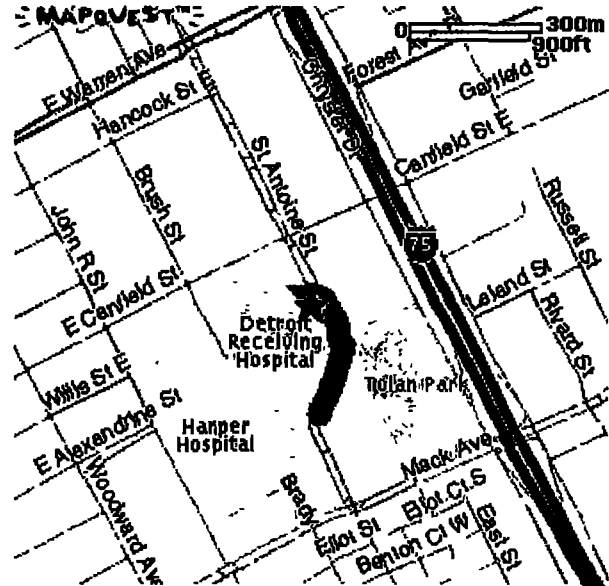
Distance: 6.8 miles

Approximate Travel Time: 12 mins



©2000 MapQuest.com, Inc.; ©2000 Navigation Technologies

Full Route



©2000 MapQuest.com, Inc.; ©2000 Navigation Technologies

Destination

Directions

- | | Miles |
|--|--------------|
| 1. Start out going Northwest on GREEN ST S by turning right. | 0.3 |
| 2. Turn RIGHT onto FORT ST W/MI-3 . | 0.6 |
| 3. Turn LEFT onto DRAGOON ST . | 0.1 |
| 4. Turn RIGHT onto FISHER FRWY W . | 0.0 |
| 5. Turn SLIGHT LEFT to take the I-75 NORTH ramp. | 0.1 |
| 6. Merge onto I-75 N . | 4.0 |
| 7. Take I-75 NORTH/I 375 SOUTH RAMP towards DOWNTOWN/FLINT . | 0.2 |
| 8. Merge onto I-75 NORTH RAMP . | 0.3 |
| 9. Merge onto I-75 N/CHRYSLER FRWY . | 0.3 |
| 10. Take the exit, exit number 52 , towards MACK AVE . | 0.1 |
| 11. Stay straight to go onto CHRYSLER DR . | 0.0 |
| 12. Turn LEFT onto MACK AVE . | 0.3 |



10411 Darling Road • Milan, Michigan 48160
(734) 587-8275 • Fax: (734) 587-3533



June 5, 2001

To Whom It May Concern:

London Aggregates is located at 10411 Darling rd., Milan, MI., Monroe County.

To the best of our knowledge, our facility has never been listed as a suspected dumping site for chemical, toxic, hazardous, or other waste materials by any Federal or State agency. The materials sold from our facility are bank run.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jay Ellis'.

Jay Ellis
Quality Control